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September 14, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: *In the Matter of Truth-in-Billing and Billing Format*, CC Docket No. 98-170

Dear Ms. Salas:

Enclosed for filing are the original and four (4) copies of Qwest Communications Corporation's Comments on Petitions for Reconsideration and Clarification filed in the above-referenced proceeding.

Please acknowledge receipt of this filing by date-stamping the enclosed copy included for this purpose. If you have any questions regarding this filing, please contact me at (703) 363-3131.

Sincerely,

Teresa K. Gaugler  
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cc: ITS, Inc.

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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**SEP 14 1999**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

In the Matter of  
  
Truth-in-Billing  
and  
Billing Format

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CC Docket No. 98-170

**COMMENTS OF QWEST COMMUNICATIONS CORPORATION**

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September 14, 1999

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Truth-in-Billing	)	
and	)	CC Docket No. 98-170
Billing Format	)	
	)	

**INTRODUCTION**

Qwest Communications Corporation ("Qwest") hereby submits its comments on the Petitions for Reconsideration and Clarification of the Federal Communication Commission's ("FCC's" or "Commission's") *First Report and Order* in the above-referenced proceeding.<sup>1</sup>

Qwest urges the Commission to abandon its decision to mandate standardized labels for charges associated with federal regulatory action. Such a rule violates carriers' First Amendment right to free speech and imposes unnecessary costs on carriers without a commensurate benefit to consumers.

The Commission should also reconsider requiring carriers to distinguish between deniable and nondeniable charges on customer bills because such a requirement would impose significant costs on carriers to modify their billing systems and would benefit only a small percentage of customers who may contest charges on their bills. The costs

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<sup>1</sup> *In the Matter of Truth-in-Billing and Billing Format*, CC Docket No. 98-170, First Report and Order and Further Notice of Proposed Rulemaking (rel. May 11, 1999) (*First Report and Order*).

of such modification will ultimately be borne by all consumers even if they receive no benefit from the information.

Qwest supports petitions requesting that the Commission reconsider requiring carriers to highlight new service providers for each service on the bill. Specifically, carriers should not be highlighted as new service providers for services such as “dial around” and operator services. Those services are authorized on a call-by-call basis, thus notification as a “new service provider” may confuse customers by leading them to believe that they have inadvertently switched presubscribed carriers rather than simply having used a “dial around” service.

Finally, Qwest agrees that the Commission’s Truth-in-Billing requirements should not apply where carriers have negotiated billing formats with their customers. There is no reason for the Commission to intervene in those circumstances and supplant its own preferences for those of a customer.

## **DISCUSSION**

### **I. THE COMMISSION SHOULD NOT MANDATE STANDARDIZED LABELS FOR CHARGES RESULTING FROM FEDERAL REGULATORY ACTION.**

Qwest supports petitions urging the Commission to reconsider its decision to mandate standardized labels for line item charges to recover costs incurred as a result of federal regulatory action. The Commission’s rule amounts to compelled speech in violation of the First Amendment. As the Commission correctly noted in the *NPRM*, “[R]estrictions on speech that ban truthful, non-misleading commercial speech about a

lawful product cannot withstand scrutiny under the First Amendment.”<sup>2</sup> Thus, although misleading commercial speech is not protected under the First Amendment,<sup>3</sup> the Commission cannot justify mandating the language of such labels merely because there is a possibility that carriers might otherwise use misleading labels for those charges. The Commission suggests that it may escape this scrutiny because it has not mandated all forms of communication regarding charges relating to regulatory action. Because the Commission has mandated a portion of that communication, it has infringed on carriers’ First Amendment rights by pre-empting truthful, non-misleading speech that Qwest and other IXCs would otherwise make on the portion of the bills where the FCC-mandated language will appear.

Because the Commission proposes to dictate the content of carriers’ commercial speech, the rule is subject to heightened constitutional scrutiny,<sup>4</sup> and it cannot survive that scrutiny since there are less burdensome alternatives that adequately address any legitimate government interest. For example, the Commission could create a group of “approved terms” from which carriers may choose terminology to label and/or describe these federal regulatory charges, or alternatively, the Commission could explicitly prohibit certain terminology. In this way, consumers could be protected by receiving bills with clear and accurate line item descriptions. At the same time, carriers whose current labels fell within the acceptable parameters would not incur costs involved with

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<sup>2</sup> *In the Matter of Truth-in-Billing and Billing Format*, CC Docket No. 98-170, Notice of Proposed Rulemaking (rel. Sept. 17, 1998) (*NPRM*) (citing *44 Liquormart, Inc. v. Rhode Island*, 517 U.S. 484 (1996)).

<sup>3</sup> *First Report and Order* ¶ 60 (citing *Central Hudson Gas & Elec. Corp. v. Public Serv. Comm’n*, 447 U.S. 557, 563-564 (1980)).

<sup>4</sup> See *Pacific Gas & Elec. v. Public Util. Comm’n of California*, 475 U.S. 1 (1986).

changing their current labels. Thus, the “approved terms” approach would accomplish the Commission’s objectives while being less burdensome on carriers. For these reasons, the “approved terms” approach is not only better public policy but also the method far more likely to survive judicial review.

In addition to the constitutional infirmities of the mandatory labels, the Commission’s selection of one specific label out of the myriad of acceptable options would be arbitrary and capricious, in violation of the Administrative Procedure Act. There is no principled basis for the Commission to determine that one label is more clear or accurate than another.

Finally, if the Commission mandates such labels, it will impose costs on carriers without a commensurate benefit to consumers. Carriers have already incurred costs in educating customers about these charges and in implementing their current labels in their billing systems, and the Commission’s rules already mandate that carriers must provide a “brief, clear, non-misleading, plain language description” of all charges.<sup>5</sup> Therefore, there is no need for the Commission to go beyond this clear requirement and mandate specific language for these charges.

The Commission can and should address consumer complaints about possibly vague or misleading line item descriptions through its enforcement process. Addressing outliers in this way would place costs of compliance only on those carriers that have elected to use untruthful or misleading labels while imposing no costs on other carriers. Qwest submits that this approach rewards those carriers that have implemented line item

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<sup>5</sup> 47 CFR § 64.2001(b).

labels that are already truthful and non-misleading, while punishing those carriers that have not done so.

## **II. THE COMMISSION SHOULD NOT REQUIRE CARRIERS TO DIFFERENTIATE BETWEEN DENIABLE AND NONDENIABLE CHARGES ON THEIR BILLS.**

Qwest opposes the Commission's rule requiring carriers to differentiate between deniable and non-deniable charges on customer bills. Qwest's billing system is not equipped to provide such a characterization, and Qwest would incur substantial costs to implement such a modification. Where Qwest employs LEC billing, it is restricted by the functionality of those systems, many of which are today are incapable of differentiating between deniable and non-deniable charges. This may result in higher long distance rates as well to the extent LECs are able to pass on to IXC's the costs associated with modifying their billing systems to accommodate the deniable/nondeniable labeling requirement.

Qwest agrees with U S WEST that more clarity should be provided at the stage where disconnection is imminent rather than at the billing stage where the vast majority of customers have no need for such information.<sup>6</sup> There is no need for the Commission to intervene in the billing relationship to dictate the presentation of information at the point in time when the information is only relevant to a small percentage of customers. A cost-benefit analysis would demonstrate that the costs of implementing such a rule far outweigh the benefits to customers as a whole. Furthermore, the costs of modifying billing systems will ultimately be borne by all consumers, the majority of whom have no interest in this information. Therefore, absent reconsideration by the Commission, most

purchasers of long distance service will be required to bear the cost of such regulation without receiving any benefit.

Although the Commission rejects arguments that this requirement would lead to an increase in uncollectibles for carriers' legitimate charges,<sup>7</sup> this is a very real concern for carriers. The natural consequence of such a notice is that customers who may be inclined to resist paying legitimate charges may be persuaded by such a notice that he or she need not pay. There is no question that IXC's will have difficulty collecting payment for these legitimate charges. Ultimately consumers will pay the price for this decision by the Commission because carriers will pass on to their customers the costs associated with increased bad debt load that results from the Commission's deniable/non-deniable mandate. The bad debt costs are in addition to the costs will be incurred as a result of modifying billing systems to permit differentiation between deniable and non-deniable charges. The Commission's suggestion that carriers can provide bill messaging to educate consumers about the consequences of failure to pay authorized charges merely adds further costs to carriers in providing additional billing messages to counteract the pitfalls of the Commission's rule.

**III. THE COMMISSION SHOULD CLARIFY THAT NEW SERVICE PROVIDERS NEED NOT BE IDENTIFIED FOR CASUAL CALLING OR OPERATOR SERVICES OR, IN THE ALTERNATIVE, SHOULD MODIFY ITS DEFINITION OF "NEW SERVICE PROVIDER."**

Qwest supports MCI's request for clarification that the Commission's rule requiring identification of new service providers does not apply to "dial around," casual billed, or operator services because use of such services on a call-by-call basis does not

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<sup>6</sup> U S WEST Petition at 14-15.



change a customer's presubscribed carrier.<sup>8</sup> The Commission's requirement that each charge on the bill be accompanied by an identified service provider will address the concern that customers may be unaware of those charges. With the service provider identified for each charge on the bill, customers will be able to determine if they utilized such services. Customers should be expected to review their bills to determine the accuracy of the charges, rather than require carriers to incur significant costs to highlight duplicate information of little use to the customer.

As MCI notes, authorization of casual calling or operator services occurs when the customer dials the required codes.<sup>9</sup> Thus, the Commission should be less concerned with unauthorized charges than with presubscribed carrier changes where carriers submit change orders based on verbal or written consent from the consumer. Furthermore, because dial-around and operator service providers are used on a call-by-call basis, notification as a "new service provider" may confuse customers who may believe they have inadvertently switched presubscribed carriers by a one-time use of a "dial around" service provider.

Alternatively, if the Commission decides to apply its notification rule to casual calling and operator services, Qwest suggests the Commission clarify its definition of new service provider to allow carriers to easily and accurately provide such information to billing LECs. For example, USTA requests that the Commission redefine "new service provider" as a provider that has not submitted charges to be billed within the last six

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<sup>7</sup> *First Report and Order* ¶ 48.

<sup>8</sup> MCI Petition at 11.

<sup>9</sup> *Id.* at 11.

months.<sup>10</sup> When Qwest uses the billing services of LECs, it does not know whether it “billed for services on the previous billing statement.”<sup>11</sup> Qwest submits charges to each billing LEC continuously throughout the month, and the LEC submits a bill to the customer at the close of each monthly billing cycle. Qwest has no way of determining which charges it submitted appeared on the previous month’s bill versus an earlier bill or the current bill. Consequently, it has no way of determining and notifying the LEC that it is a “new service provider.” Thus, IXCs cannot comply with the Commission’s rules if they are expected to pass information to the billing LEC that they are a new service provider, as defined by the Commission’s current rules.

**IV. THE COMMISSION’S TRUTH-IN-BILLING REQUIREMENTS SHOULD NOT APPLY WHERE BILLING FORMATS ARE NEGOTIATED WITH A CUSTOMER.**

Qwest supports MCI’s request for clarification that compliance with the Truth-in-Billing requirements should not apply where carriers have negotiated with customers for specific billing formats or labels different from those mandated by the Commission.<sup>12</sup> Qwest currently provides billing information in different formats based on the requests of customers. Qwest engages in arms-length negotiations with a customer to determine the best bill organization to serve the customer’s needs. Because Qwest negotiates these transactions with sophisticated business customers, it would seem unnecessary and in fact harmful to these customers if the Commission were to override these negotiations and supplant its preferences for those of the customer.

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<sup>10</sup> USTA Petition at 7.

<sup>11</sup> *Id.* at 6.

## CONCLUSION

For the reasons stated above, the Commission should (1) abandon its decision to mandate standardized labels for charges associated with federal regulatory action; (2) reconsider requiring carriers to distinguish between deniable and nondeniable charges on customer bills; (3) clarify that carriers should not be highlighted as “new service providers” for services such as casual calling and operator services, or in the alternative, modify its definition of “new service provider;” and (4) clarify that its Truth-in-Billing requirements do not apply where carriers have negotiated billing formats with their customers. The Commission should consider the significant costs each of these rules will impose on carriers. Because carriers will likely recover from their customers any increased compliance costs, consumers will ultimately pay the price of heavy-handed regulation by the Commission.

Respectfully submitted,

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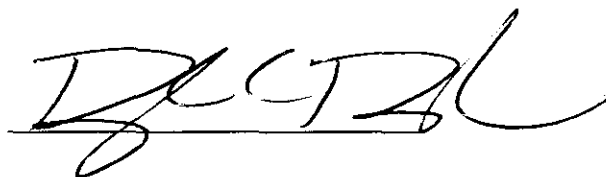
  
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September 14, 1999

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<sup>12</sup> MCI Petition at 8-9.

I, Douglas C. Nelson, hereby certify that on this fourteenth day of September, 1999, a copy of the foregoing Comments of Qwest Communications Corp. was served on the parties listed below via hand delivery (indicated by "\*\*") or first class mail, postage pre-paid.



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